

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

DEBORAH RUSSELL	*	
Plaintiff,	*	
v.	*	No. 3:20-CV-01028
	*	
CAROL ELIZABETH TANNER;	*	
THOMAS TANNER;	*	
JONATHAN JACOB COLE; and	*	
BAKER, DONELSON, BEARMAN,	*	
CALDWELL & BERKOWITZ, PC	*	
Defendants.	*	

CERTIFICATION OF GOOD FAITH

State Farm, through counsel, certifies that the undersigned attempted to resolve the issues presented by the Subpoena and Notice to Take Deposition served by Plaintiff Deborah Russell prior to filing the Motion to Quash. Despite undersigned counsel's good faith efforts, counsel for Russell refused to address the issues presented by the Subpoena and Notice to Take Deposition

Respectfully submitted this 30th day of July 2021.

KAY GRIFFIN, PLLC

/s/ Matthew J. Evans
Matthew J. Evans (BPR #017973)
matthew.evans@kaygriffin.com
900 South Gay Street, Suite 1810
Knoxville, TN 37902
(865) 314-8422
Attorney for State Farm Fire and Casualty Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was properly served on all parties or their counsel of record via the court's ECF/CM system

This 30th day of July 2021.

/s/ Matthew J. Evans
Matthew J. Evans